

EXHIBIT 117
FILED UNDER SEAL

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

09:09:27

- - - - -
JANE DOE 1, individually and on
behalf of all others similarly
situated,

Plaintiff,

Case No.

-against-

1:22-cv-10019-JSR

JPMORGAN Chase BANK NA,

Defendants.

- - - - -
x

C O N F I D E N T I A L

Videotaped oral deposition of
Richard Kahn taken pursuant to notice,
was held REMOTELY, commencing May 18,
2023, 9:21 a.m., on the above date,
before Leslie Fagin, a Court Reporter
and Notary Public in the State of New
York.

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1 R. Kahn
 2 accounts at JPMorgan? 10:46:23
 3 A. I was not that involved in the cash 10:46:25
 4 withdrawal process. I believe it was [REDACTED] 10:46:30
 5 that was requesting it; potentially Harry was 10:46:33
 6 going to get it from the bank. 10:46:37
 7 But I do recall there was a certain 10:46:41
 8 period of time when I first started that 10:46:44
 9 there were large withdrawals of cash, and 10:46:48
 10 that was because the pilots were requesting 10:46:54
 11 cash because they were able to negotiate 10:46:59
 12 favorable rates from the fuel provider when 10:47:04
 13 they would take long trips, they would get a 10:47:08
 14 better rate if they paid with cash. 10:47:11
 15 So there were larger withdrawals 10:47:14
 16 because I think at that time jet fuel was 6- 10:47:17
 17 or \$7 per gallon, and the plane could hold 6- 10:47:22
 18 to 8,000 gallons, you know, it was a large 10:47:26
 19 amount that was being paid for fuel. 10:47:29
 20 Q. Which pilots were requesting cash? 10:47:30
 21 A. I don't recall which ones, but I 10:47:34
 22 believe the pilots at the time were Larry 10:47:37
 23 Visoski, Dave Rogers, and Bill Hammond. 10:47:40
 24 Q. And you think it was Visoski, 10:47:46
 25 Rogers, or Hammond that were requesting cash? 10:47:49

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1	R. Kahn	
2	to that entity.	11:27:01
3	Q. What was the plane entity,	11:27:02
4	Hyperion, Inc.?	11:27:06
5	A. Hyperion was one of the plane	11:27:06
6	entities, and I believe JEJE, Inc. was the	11:27:08
7	other.	11:27:12
8	Q. And when we are talking about cash	11:27:12
9	that is paid for fuel, are you saying cash	11:27:14
10	being wire transferred to a fuel company, or	11:27:20
11	are you saying cash being -- somebody goes to	11:27:24
12	the teller, withdraws cash money --	11:27:28
13	A. Correct.	11:27:28
14	Q. -- and then hands that for fuel?	11:27:30
15	MS. ELLSWORTH: Object to form.	11:27:32
16	A. Correct.	11:27:33
17	MS. ELLSWORTH: I'm not sure what	11:27:34
18	cash you are using in this context.	11:27:37
19	MR. EDWARDS: I'm having the same	11:27:39
20	problem.	11:27:40
21	Q. So what do you mean by cash?	11:27:40
22	A. My understanding of cash is green	11:27:41
23	bills.	11:27:44
24	Q. Okay.	11:27:46
25	A. Not a wire or a check or not a	11:27:46

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1 R. Kahn
 2 money by wire to them, why would it make any 11:32:00
 3 difference whether this is in green bills or 11:32:03
 4 -- they're still receiving the money? 11:32:08
 5 A. To answer your question, I think 11:32:10
 6 what you are asking why in some circumstances 11:32:12
 7 did we pay credit card, cash, or wire, and my 11:32:14
 8 answer for that is kind of something that we 11:32:18
 9 applied with all vendors, not just fuel. We 11:32:20
 10 were always trying to get the best prices, 11:32:23
 11 whether it was fuel, whether it was an 11:32:25
 12 architect, purchasing pretty much whatever it 11:32:27
 13 was. So we would normally go where the best 11:32:30
 14 deal was. 11:32:33
 15 So in the circumstance where 11:32:34
 16 Mr. Epstein used green bills cash, I believe 11:32:37
 17 that was a New York vendor, and I believe it 11:32:40
 18 was JFK Airport, but I'm not 100 percent 11:32:42
 19 sure. 11:32:47
 20 In this example here, on the 11:32:47
 21 exhibit, Exhibit 4, the last page, we were 11:32:48
 22 able to get the best pricing by prepaying and 11:32:51
 23 buying the fuel in bulk. 11:32:54
 24 So we didn't discriminate against 11:32:56
 25 using cash, credit card, or wire. We were 11:32:58

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1	R. Kahn	
2	seeking the best pricing.	11:33:00
3	Q. But by this point in time that we	11:33:01
4	are looking at, 2012, that's long after the	11:33:04
5	time period where you were using green bills	11:33:06
6	to pay for case -- I mean to pay for fuel?	11:33:08
7	A. I only remember a short window of	11:33:11
8	time that we paid cash for fuel.	11:33:14
9	Q. And that short window being before	11:33:16
10	the time period Jeffrey Epstein went to jail	11:33:17
11	in Florida; meaning, early in your	11:33:19
12	relationship?	11:33:22
13	A. Correct.	11:33:23
14	Q. And during that period of time	11:33:24
15	where you would have used cash, would that	11:33:26
16	money have come from the -- from your office,	11:33:30
17	picked up by Larry Visoski, and taken to	11:33:35
18	whoever the vendor was for fuel?	11:33:38
19	MS. ELLSWORTH: Object to form.	11:33:41
20	A. Yes. At the time New York Strategy	11:33:43
21	Group would have been the office that Larry	11:33:48
22	came to and collected the cash, correct.	11:33:51
23	Q. And would you have had receipts for	11:33:53
24	that fuel?	11:33:55
25	A. We wouldn't have them at the time	11:33:57